

1 Christopher A. Carr (#44444)  
ccarr@afrcf.com  
2 Viddell Lee Heard (#175049)  
vheard@afrcf.com  
3 ANGLIN, FLEWELLING, RASMUSSEN,  
CAMPBELL & TRYTTEN LLP  
4 199 S. Los Robles Ave., Suite 600  
Pasadena, California 91101-2459  
5 Tel: (626) 535-1900  
Fax: (626) 577-7764

6 Attorneys for Defendant  
7 WELLS FARGO BANK, N.A., successor  
8 by merger with Wells Fargo Bank Southwest, N.A.,  
f/k/a Wachovia Mortgage, FSB, f/k/a World Savings Bank, FSB

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

12 NADER SHATERIAN, ) CASE NO. C 11-00920-SC  
13 Plaintiff, )  
14 vs. ) [Assigned to the Honorable Judge Samuel Conti]  
15 )  
16 WELLS FARGO BANK, NATIONAL ) **STIPULATION AND ORDER FOR**  
17 ASSOCIATION; CAL-WESTERN ) **CONTINUANCE OF NOVEMBER 29, 2011**  
18 RECONVEYANCE CORPORATION; ) **CASE MANAGEMENT CONFERENCE**  
19 and DOES 1-50, Inclusive )  
Defendants. ) Date: to be reset  
 ) Time: to be reset  
 ) Courtroom: 1  
 )

21 By this stipulation, the parties to this action request that the Court continue the Case  
22 Management Conference in this action, currently scheduled for November 29, 2011, for  
23 approximately 60 days.

24 The reasons for this request are as follows. First, the parties have recently been having  
25 productive discussions regarding a potential settlement, and would like to direct their energies  
26 toward those discussions in advance of the Case Management Conference. Second, the parties are  
27 continuing to analyze the Court's November 7, 2011 Order regarding the motion to dismiss and to  
28 determine the Order's effect on various case management and settlement issues. Third, defendant

1 Cal-Western Reconveyance Corporation filed a Declaration of Non-Monetary Status prior to the  
 2 case being removed to Federal Court. Plaintiff contends that this Declaration was not effective to  
 3 make Cal-Western a Nominal Party, because the case was removed to Federal Court before 15 days  
 4 had passed from the date the Declaration was filed, and Plaintiff subsequently filed an Objection to  
 5 the Declaration of Non-Monetary Status (Doc #15). Cal-Western filed a Reply to this opposition  
 6 (Doc. #36), but the Court has not ruled as to whether Cal-Western is or is not a nominal party.  
 7 Fourth, Nicole Neff of the Wright Finley firm, counsel for defendant Cal Western, is on her  
 8 honeymoon until November 30, and it is desired that she participate in the conference and the  
 9 parties' other discussions.

10 **STIPULATION**

11 Plaintiff Nader Shaterian (“Plaintiff”) and Defendants Wells Fargo Bank, N.A. and Cal-  
 12 Western Reconveyance Corporation, by and through their respective counsel, hereby stipulate and  
 13 request this Court continue the Case Management Conference currently scheduled for November  
 14 21, 2011 for approximately 60 days, with a corresponding continuance for the filing of a joint Case  
 15 Management Statement.

16 Dated: November 21, 2011

ANGLIN, FLEWELLING, RASMUSSEN,  
 CAMPBELL & TRYTTEN LLP

17

18

By: /s/ Viddell Lee Heard  
 Viddell Lee Heard  
 Attorneys for Defendant Wells Fargo  
 Bank, National Association

19

20

21

BLOOMFIELD LAW GROUP, INC.  
 A Professional Corporation

22

23

24

25

By: /s/ Neil Jon Bloomfield  
 Neil Jon Bloomfield  
 Attorneys for Plaintiff Nader Shaterian  
 WRIGHT, FINLAY & ZAK, LLP

26

27

28

By: /s/ Nicole K. Neff  
 Nicole K. Neff, Esq.  
 Attorneys for Defendant Cal-Western  
 Reconveyance Corporation

## **DECLARATION OF CONSENT**

Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the above-listed counsel for Defendants Wells Fargo Bank, N.A. and Cal-Western Reconveyance Corporation

Dated: November 21, 2011

/s/ Viddell Lee Heard

Viddell Lee Heard

## ORDER

2 PURSUANT TO STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the Case  
3 Management Conference currently scheduled for November 21, 2011 is continued to 2/10,  
4 10:00  
2012 at 9:00 a.m.

6 | Dated: 11/22/12



**CERTIFICATE OF SERVICE**

I, the undersigned, declare that I am over the age of 18 and am not a party to this action. I am employed in the City of Pasadena, California; my business address is Anglin, Flewelling, Rasmussen, Campbell & Trytten LLP, 199 S. Los Robles Avenue, Suite 600, Pasadena, California 91101-2459.

On the date below, I served a copy of the following documents entitled:

**STIPULATION AND ORDER FOR CONTINUANCE OF NOVEMBER 29, 2011  
CASE MANAGEMENT CONFERENCE**

on all interested parties in said case addressed as follows:

*Served Electronically Via The Court's CM/ECF System:*

*Counsel for Plaintiff*

*Counsel for Defendant,*

Neil Jon Bloomfield, Esq.  
Randall L. Hornibrook, Esq.  
BLOOMFIELD LAW GROUP, INC.  
901 E. St., Ste. 100

*CAL-WESTERN RECONVEYANCE  
CORPORATION*

Tel: 415.454.2294 Fax: 415.457.5348  
[njbloomfield@njblaw.com](mailto:njbloomfield@njblaw.com)

Robin Prema Wright, Esq.  
Nicole K. Neff, Esq.  
WRIGHT, FINLAY & ZAK, LLP  
4665 MacArthur Ct., Ste. 280  
Newport Beach, CA 92660

Tel: 949.477.5050 Fax: 949.477.9200  
[rwright@wrightlegal.net](mailto:rwright@wrightlegal.net)  
[nneff@wrightlegal.net](mailto:nneff@wrightlegal.net)

**BY MAIL:** By placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with the firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in Pasadena, California, in sealed envelopes with postage fully thereon.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. This declaration is executed in Pasadena, California, on **November 21, 2011**.

Christine L. Daniel

(Print name)

/s/ Christine L. Daniel

(Signature)